TOWN OF ERVING

P.O.T.W. #1 / Water Dept.

Tel: 413-423-3354
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12 East Main Street
ERVING MASSACHUSETTS 01344

WW / Water Superintendent
peter.sanders@erving-ma.gov

Permit # MA0101052

March 4, 2020

Justin Pimpare
Regional Pretreatment Coordinator
EPA New England
5 PO Square
Suite 100 – OEP 06-03
Boston, MA 02109

Dear Mr, Pimpare

Enclosed is the Pretreatment Report for POTW#2 Permit # MA0101052 for 2020. We still take our CA samples at the same time if possible, with POTW#2 as means of double checking each other. Any questions or concerns please call (413) 423-3354.

Regards,

Peter Sanders
WW / Water Superintendent - Industrial Coordinator

Cc: Mass DEP, Division of Watershed Management
Mass DEP, Western Regional Office – Bureau of Resource Protection
Mass DEP, Bureau of Waste Prevention
Town of Erving Select Board

Town of Erving
Annual Pretreatment
Report
2020

In accordance with NPDES Permit # MA0101052, (POTW #2), and **40 C.F.R. 403** an annual report summarizing activities and effectiveness of all Pretreatment Programs must be submitted annually to the Environmental Protection Agency. Information requested in **Attachment C, NPDES Permit Requirement** will be addressed below.

1. An updated list of all industrial users by category, as set forth in **40 C.F.R. 403.8(f)(2)(i),** indicating compliance or noncompliance with the following:
   - Baseline monitoring reporting requirements for newly promulgated industries. **No new industries**
   - Compliance status reporting requirements for newly promulgated industries. **No new industries.**
   - Standards and local limits; **Attachments: Appendix (A) POTW #2 Effluent Monthly Data 2020, Erving Center IPP Violation Log, Erving Center DMR Violation Log,**
2. Summary of compliance and enforcement activities during the preceding year including the number:
   - Significant industrial users inspected.
   - Significant industrial users sampled. Quarterly Analysis on **Erving Paper Mill effluent on 6/24/2020, 10/6/2020,11/18/2020, 12/2/2020, CA sampling on 6/25/2020, 10/8/2020, 11/19/2020, 11/25/2020, 12/3/2020. (all samples are split for QA/QC with POTW #2 lab, BOD, Tss) No Violations. (Appendix C Sampling Analysis 2019)results**
   - Compliance schedules issued. **None**
   - Administrative orders issued. **None**
   - Criminal or civil suits filed. **None**
   - Penalties obtained. **None**
3. Local newspaper list of significantly violating industries required to be published in accordance with **40 C.F.R. 403.8(f) (2) (vii);** No **publications.**
4. Erving Paper Mill produces a quality tissue grade paper using total recycled paper. Approximately 160-180 tons of paper is recycled daily by 119 employees working a continuous 24 hours/day, seven days a week. The production process halts on major holidays and a maintenance crew covers. The effluent from the mills outfall #001discharges directly to POTW #2. Sulfuric acid pH adjustment is started at the mills outfall and continues at the headworks of POTW #2. Included is the **Erving Center wastewater Treatment Facility (IPP-Violation Log)** that dates back to 2010 and POTW #2, **DMR Violation**

Log that dates back to 2010 and was provided by Ben Thompson, Chief Operator at POTW #2. Erving Industries also owns a subsidiary called Erseco. Erseco is a separate entity from Erving Paper Mill. Erseco staffs and operates POTW # 2. Mike McAuliffe is the General Manager for Erseco, and administrates the funding and staffing of POTW #2. Ben Thompson is the Chief Operator for Erseco and supervises the operation of the wastewater treatment plant. POTW #2 is manned 24 hours a day. Ben Thompson has a Grade 7C WWTP license. Peter Sanders is the Chief Operator for the Town of Erving, he has a Grade 5C WWTP license. He does report, administrate and oversee the operation of POTW #1, 2, & 3. The Chief Operator is an agent for the **Control Authority (Town of Erving).** The Town of Erving is the NPDES permit holder for POTW #1, 2 and 3. A Pretreatment Agreement exists between the CA and Erving Paper Mill .

5. A summary of all pollutant analytical results for influent, effluent, and toxicity data from the wastewater treatment facility are included. Included in this report is **Appendix (A)** representing the annual DMR values reported monthly to the Department of Environmental Protection and the Environmental Protection Agency. Also included is the **IPP Violation Log** that represents quarterly IPP Monitoring of the effluent violations from Erving Paper Mill. The IPP Violation Log tracks violations back to 2010. No interference or pass-through resulted at POTW #2 as a result of the BOD loading. When the original Permit was drafted the Erving Paper Mill was the primary constituent for incoming waste. It has been determined that the BOD loading to the POTW can only be determined from Outfall 001 in the basement of Erving Paper Mill. The Pretreatment Agreement was renewed amended and signed by the Board of Selectman on February 27, 2016. Tighe & Bond participated in resolving the issue of compliance that is based on a combine waste stream at POTW # 2 headworks. Tighe & Bond, the Town of Erving and Erving Paper Mill have all agreed to amend the Permit to specify that Outfall 001 located at Erving Paper Mill basement will be the site of sampling to determine compliance or noncompliance. POTW # 2 provides a service to Septic Service Companies and processing septage is a routine and continual process. It has been determined that the BOD loading from this process can cause an occasional BOD result that reflects negatively towards Erving Paper Mill. The **DMR Violation Log** included represents POTW #2 violations for 2020 and tracks back to 2010. There were no violations for effluent BOD in 2020.
6. Casella Organics is the contract company that prepares sludge cake from POTW #2 for land application. A Bio mix of sludge and top soil is prepared for land reclamation. New England organics specializes in this area and sells the Bio clay mix and oversees projects to promote

vegetative growth. Erseco is responsible for all sludge analysis required.

7. Description of all interferences and pass-through that occurred during past year. **None.**
8. Description of all investigations into interference and pass-through for the past year. **No incidence of interference or pass-through** occurred in 2020 as a result of Erving Paper Mill production process.
9. Description of monitoring, sewer inspections and evaluations that were done over the past year to detect interference and pass-through. **No interference or pass-through occurred in 2020. Erving Paper Mill effluent discharges directly into 14"outfall (OUTFALL 001) that discharges directly to POTW #2.**
10. Description of actions taken to reduce the incidence of significant violations by SIU. **Erving Paper Mill did not have any significant violations. No action was necessary.**
11. Latest adoption of local limits and an indication whether or not the Town is under State or Federal compliance schedule that includes steps to be taken to revise local limits. **The characteristics of Pulp, Paper and Paperboard Manufacturing Point Source Category, Subpart 1 (Secondary Fiber Deink), Existing Source (40 CFR 430.96) categorical discharge must not exceed limits listed in the (TOWN OF ERVING-INDUSTRIAL PRETREATMENT PERMIT COMPLIANCE attachment).** The latest adoption of Local Limits as set forth in 40 CFR Part 403.8(f) (l) (iii) ("POTW Pretreatment Requirements") of the "General Pretreatment Regulations for Existing and New Sources of Pollution," has an Effective Date of: March 5, 2017 and an Expiration Date of March 4, 2022, Wastewater Discharge Permit No. 02-12 is under Federal Compliance Standards and is amended from original agreement dated July 9, 1973. Applicable State and Local Sewer Use laws regulate Erving Paper Mill if more stringent than Federal Schedules. The Pretreatment Permit was signed by the Erving Select board on December 5, 2016, with the effective date of March 5, 2017 and expiration date of March 4, 2022. At this time the effectiveness of the IPP Program is rated high. Communication and cooperation exist between Erving Paper Mill, Erseco and the Town.

Included with Report

1. **Appendix (A) Erving POTW #2 Effluent Monthly Data**
2. **Appendix (B) Influent Quarterly Analysis POTW #2**
3. **Appendix (C) Sampling Analysis 2019 at Outfall 001**
4. **Erving Center Wastewater Treatment Facility (DMR-Violation Log).**
5. **Erving Center Wastewater Treatment Facility (IPP-Violation Log)**
6. **EPA Region 1 Annual Pretreatment Summary Sheet 2019**

Appendix (A) Erving POTW#2 Effluent Monthly Data 2020

	January	February	March	April	May	June	July	August	September	October	November	December
BOD M. Av. Lbs/d Eff	247	353	454	107	95	65	22	33	77	201	421	796
BOD Dly. Max. lbs/d Eff	524	916	1531	138	168	135	45	65	215	468	776	2904
pH Grab Min.	6.5	6.7	6.5	6.7	6.9	7	7	7.1	7	6.9	6.7	6.5
pH Grab Max	7.3	7.1	7.2	7.1	7.6	7.3	7.5	7.5	7.5	7.5	7.6	7.4
TSS M. Av. Lbs/d Eff	19	326	494	215	176	157	112	77	232	189	281	981
TSS Dly. Max. Lbs/d Eff	39	857	1240	616	424	283	288	189	851	987	1010	3410
E.coli#/100ml D/Mx,	Seasonal	Seasonal	Seasonal	228	5	5	2	147	40	177	Seasonal	Seasonal
Phosphorus mg/l	Seasonal	Seasonal	Seasonal	0.025	0.105	0.03	0.032	0.045	0.012	0.06	Seasonal	Seasonal
Phosphorus D/max	Seasonal	Seasonal	Seasonal	0.04	0.22	0.05	0.06	0.11	0.04	0.16	Seasonal	Seasonal
Copper T. Max ug/l	0	0	0	0	0	0	0	0	0	0.15	0	0.38
BOD % removal	98.4	98.1	97.1	99.2	99.4	99.6	99.7	99.8	99.6	99	98.6	96.7
TSS % removal	99.1	99.5	99.3	99.6	99.7	99.7	99.7	99.8	99.5	99.5	99.5	98.5
BOD Mon.Avr lbs. Inf.	15691	18923	16173	13884	17429	19248	10505	17724	19920	21589	31109	24797
TSS Mon. Avr. Lbs. Inf.	72143	76943	76101	66076	64987	64474	53285	55484	47733	45026	68790	67695
Flow 12M/Av mgd	1.63	1.63	1.6	1.61	1.62	1.57	1.57	1.32	1.16	1.42	1.53	1.59
Cl2 Dly Max. mg/l	Seasonal	Seasonal	Seasonal	0.08	0.09	0.08	0.07	0.05	0.07	0.18	Seasonal	Seasonal
Lc50 Static C-dahnia%	>100	Q	Q	>100	Q	Q	Q	>100	Q	>100	Q	Q
7day chronic Cerdaf%	25.00%	Q	Q	50%	Q	Q	Q	25	Q	50%	Q	Q
Nitrogen Total mg/L	29.92	32.6	45.3	28.2	14.86	23.6	26.82	27.52	126	22.5	26.8	39.78
Nitrite+Nitrate	0	0	0	0	0	0	0	0	20.3	0	0	0
N TKN mg/l	29.92	32.6	45.3	28.2	14.86	23.6	26.82	27.52	126	22.5	26.8	39.78
Ammonia&Ammonium	0.507	0.39	0.47	0.94	0	0.85	10.06	1.65	11	0	0	0

Erving Papermill Effluent IPP Monitoring

Appendix (B) Influent Quarterly Analysis POTW # 2

Sample Date	Arsenic mg/L	Cadmium mg/L	Chromium mg/L	Copper mg/L	Lead mg/L	Nickel mg/L	Silver mg/L	Zinc mg/L	TSS mg/L	Cyanide(T) mg/L	BOD mg/L
6/24/2020	ND	ND	0.015	0.19	ND	0.011	0.0061	0.75	4924	0	1470
10/6/2020	ND	ND	0.018	0.24	ND	0.013	0.016	0.81	3802	0.013	1823
11/18/2020	ND	ND	0.018	0.087	0.01	0.015	0.0086	0.73	5391	0	2438
12/2/2020	ND	ND	0.029	0.11	0.013	0.03	0.021	1.6	5105	0	1870

Appendix C Sampling Analysis 2020					
Date	**Flow mgd**	**BOD mg/L**	**BOD lbs**	**Tss mg/L**	**Tss lbs**
6/25/2020	1.35	1074	12092.00	5100	57421.00
10/8/2020	1.41	1272	14958.00	4672	54940.00
11/19/2020	1.19	1041	10332.00	4796	47598.00
11/25/2020	1.64	1167	15962.00	4572	62534.00
12/3/2020	1.3	1054	11427.00	3308	35865.00
Average	1.81	1226.63	12954.20	6710	51671.60
Max	1.64	1272	15962.00	5100	62534.00
Min	1.19	1041	10332.00	3308	35865.00

ERVING CENTER WASTEWATER TREATMENT FACILITY

DMR VIOLATION LOG

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
JAN	No violations	No Violations	No Violations	No Violations	No violations	No Violations	No Violations	BOD max.(1)	No violations	No violations	No violations
FEB	No violations	WET LC50 NOEL	No Violations	No Violations	No violations	No Violations	No Violations	BOD max.(3)	No violations	No violations	No violations
MAR	Nitrogen not tested	No Violations	No Violations	No Violations	No violations	No Violations	No Violations	No Violations	No violations	No violations	No violations
APR	Ecoli max. (1) CU Mo avg.	No Violations	No Violations	BOD max.(3) BOD Mo. Avg .Ecoli max. (2)	No violations	BOD max. (3) BOD Mo avg.	No Violations	TSS max.(1)	No violations	No violations	No violations
MAY	No violations	No Violations	Ecoli max.(1)	No Violations	No violations	No Violations	No Violations	No Violations	No violations	No violations	No violations
JUN	No violations	No Violations	No Violations	No Violations	No violations	Ecoli max.(1)	No Violations	No Violations	No violations	No violations	No violations
JUL	No violations	No Violations	No Violations	No Violations	No violations	No Violations	No Violations	No Violations	No violations	No violations	No violations
AUG	No violations	No Violations	No Violations	No Violations	No violations	No Violations	Ecoli max. (1)	Ecoli max. (1)	No violations	No violations	No violations
SEP	CU Mo. Avg	No Violations	No Violations	No Violations	No violations	No Violations	CU mo.avg	No Violations	CUmax(1)CuMo. Avg.	No violations	No violations
OCT	CU Mo. Avg	No Violations	No Violations	TSS max.(1) BOD max. (2)	WET NOEL	TSS max.(2)	No Violations	No Violations	No violations	No violations	No violations
NOV	No violations	No Violations	No Violations	No Violations	No violations	No Violations	No Violations	No Violations	No violations	No violations	No violations
DEC	No violations	No Violations	No Violations	No Violations	No violations	BOD max.(3) BOD mo.avg	BOD max.(1)	pH (2)	No violations	No violations	No violations

Client Sample Results

Client: Erseco
Project/Site: Quarterly testing

Job ID: 480-172116-1

Client Sample ID: ERVING PAPER MILL EFFLUENT COMP 24
Date Collected: 06/24/20 09:30
Date Received: 07/09/20 08:00

Lab Sample ID: 480-172116-1
Matrix: Water

Method: 200.7 Rev 4.4 - Metals (ICP)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		0.015		mg/L		07/13/20 10:04	07/14/20 18:06	1
Cadmium	ND		0.0020		mg/L		07/13/20 10:04	07/14/20 18:06	1
Chromium	**0.015**		0.0040		mg/L		07/13/20 10:04	07/14/20 18:06	1
Copper	**0.19**		0.010		mg/L		07/13/20 10:04	07/14/20 18:06	1
Lead	ND		0.010		mg/L		07/13/20 10:04	07/14/20 18:06	1
Nickel	**0.011**		0.010		mg/L		07/13/20 10:04	07/14/20 18:06	1
Silver	**0.0061**		0.0060		mg/L		07/13/20 10:04	07/14/20 18:06	1
Zinc	**0.75**		0.010		mg/L		07/13/20 10:04	07/14/20 18:06	1

Method: 245.1 - Mercury (CVAA)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.00020		mg/L		07/13/20 14:55	07/13/20 18:29	1

Client Sample ID: ERVING PAPER MILL EFFLUENT COMP 24
Date Collected: 10/06/20 08:00
Date Received: 10/15/20 08:00

Lab Sample ID: 480-176508-1
Matrix: Water

Method: 200.7 Rev 4.4 - Metals (ICP)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		0.015		mg/L		10/20/20 10:03	10/21/20 15:54	1
Cadmium	ND		0.0020		mg/L		10/20/20 10:03	10/21/20 15:54	1
Chromium	**0.018**		0.0040		mg/L		10/20/20 10:03	10/21/20 15:54	1
Copper	**0.24**		0.010		mg/L		10/20/20 10:03	10/21/20 15:54	1
Lead	ND		0.010		mg/L		10/20/20 10:03	10/21/20 15:54	1
Nickel	**0.013**		0.010		mg/L		10/20/20 10:03	10/21/20 15:54	1
Silver	**0.016**		0.0060		mg/L		10/20/20 10:03	10/21/20 15:54	1
Zinc	**0.81**		0.010		mg/L		10/20/20 10:03	10/21/20 15:54	1

Method: 245.1 - Mercury (CVAA)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.00060		mg/L		10/20/20 12:43	10/21/20 16:00	1

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Cyanide, Total	**0.013**		0.010		mg/L		10/15/20 20:22	10/17/20 13:30	1

Client: Erseco
Project/Site: Quarterly testing

Job ID: 480-178335-1

Client Sample ID: ERVING PAPER MILL EFFLUENT COMP 2A
Date Collected: 11/18/20 09:00
Date Received: 11/19/20 08:00

Lab Sample ID: 480-178335-1
Matrix: Water

Method: 200.7 Rev 4.4 - Metals (ICP)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		0.015		mg/L		11/24/20 09:12	11/24/20 20:28	1
Cadmium	ND		0.0020		mg/L		11/24/20 09:12	11/24/20 20:28	1
Chromium	**0.018**		0.0040		mg/L		11/24/20 09:12	11/24/20 20:28	1
Copper	**0.087**		0.010		mg/L		11/24/20 09:12	11/24/20 20:28	1
Lead	**0.010**		0.010		mg/L		11/24/20 09:12	11/24/20 20:28	1
Nickel	**0.015**		0.010		mg/L		11/24/20 09:12	11/24/20 20:28	1
Silver	**0.0086**		0.0060		mg/L		11/24/20 09:12	11/24/20 20:28	1
Zinc	**0.73**		0.010		mg/L		11/24/20 09:12	11/24/20 20:28	1

Method: 245.1 - Mercury (CVAA)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.00020		mg/L		11/29/20 13:37	11/29/20 16:55	1

Client Sample ID: ERVING PAPER MILL EFFLUENT COMP 2A
Date Collected: 12/02/20 08:00
Date Received: 12/10/20 08:00

Lab Sample ID: 480-179197-1
Matrix: Water

Method: 200.7 Rev 4.4 - Metals (ICP)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		0.015		mg/L		12/11/20 09:50	12/12/20 03:05	1
Cadmium	ND		0.0020		mg/L		12/11/20 09:50	12/12/20 03:05	1
Chromium	**0.029**		0.0040		mg/L		12/11/20 09:50	12/12/20 03:05	1
Copper	**0.11**		0.010		mg/L		12/11/20 09:50	12/12/20 03:05	1
Lead	**0.013**		0.010		mg/L		12/11/20 09:50	12/12/20 03:05	1
Nickel	**0.030**		0.010		mg/L		12/11/20 09:50	12/12/20 03:05	1
Silver	**0.021**		0.0060		mg/L		12/11/20 09:50	12/12/20 03:05	1
Zinc	**1.6**		0.010		mg/L		12/11/20 09:50	12/12/20 03:05	1

Method: 245.1 - Mercury (CVAA)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.0010		mg/L		12/16/20 12:48	12/16/20 16:57	1

EPA Region 1 Annual Pretreatment Report Summary Sheet
February 2021

POTW Name: Erving POTW#2

NPDES Permit MA0101052

Pretreatment Report Period Start Date: 1/1/2020

Pretreatment Report Period End Date: 12/31/2020

# of Significant Industrial Users (SIUs): 1

# of SIUs Without Control Mechanisms: 0

# of SIUs not Inspected: 0

# of SIUs not Sampled: 0

# of SIUs in Significant Noncompliance (SNC) with Pretreatment Standards: none

# of SIUs in SNC with Reporting Requirements: 0

# of SIUs in SNC with Pretreatment Compliance Schedule: 0

# of SIUs in SNC Published in Newspaper: 0

# of SIUs with Compliance Schedules: 1

# of Violation Notices Issued to SIUs: 0

# of Administrative Orders Issued to SIUs: 0

# of Civil Suits Filed Against SIUs: 0

# of Criminal Suits Filed Against SIUs: 0

# of Categorical Industrial Users (CIUs): 1

# of CIUs in SNC: 0

<u>Penalties</u>

Total Dollar Amount of Penalties Collected $ 0

# of IUs from which Penalties have been collected: 0

Local Limits

Date of Most Recent Technical Evaluation of Local Limits: Dec 2016

Date of Most Recent Adoption of Technically Based Local Limits: Dec5 2016

Pollutant	Limit (mg/l)	MAHL (lb/day)
Aluminum		
Arsenic		
BOD2		25,000M/AV 40,000D/Max
Cadmium		
Chromium		
Copper		
Cyanide (Total)		
Lead		
Mercury		
Nickel		
Oil & Grease (Total)		
Phosphorus		
Silver		
TSS2		70,000M/AV 110,000D/Max
Zinc		
PH	5.5 min 9.5 max	
Other		
Flow	2.5mgd M/AV	
	5.0mgd D/Max	
	6.0mgd Instantaneous	